

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

**John Malone,
Debtor**

**Chapter 13
Case No. 24-10885-CJP**

ASSENTED TO MOTION TO CONTINUE THE APRIL 16, 2025 HEARING
REGARDING THE BANK OF NEW YORK MELLON'S OBJECTION TO PLAN

Now come the Debtor and the Bank of New York Mellon and request the Court continue the hearing regarding the Bank of New York Mellon's Objection to Plan scheduled for April 16, 2025 for thirty days or a date convenient with the Court. In support of this Motion, Debtor states the following:

1. Debtor filed for Chapter 13 bankruptcy protection on May 8, 2024.
2. On or about July 10, 2024, the Bank of New York Mellon filed an Objection to Plan (Doc #42).
3. The Debtor has recently retained counsel and is will be amending his Plan. The parties are seeking 30 days for Debtor to file an Amended Plan.

Wherefore, the Debtor requests the following:

1. The hearing regarding the Bank of New York Mellon's Objection to Plan scheduled for April 16, 2025 be continued for thirty days or a date convenient with the Court.
2. For such other and further relief as the Court deems just.

The Bank of New York Mellon,

Debtor,
by his attorney,

By: /s/ Marcus Pratt, Esq.
Marcus Pratt, Esq.
Korde & Associates, P.C
900 Chelmsford Street, Suite 3102
Lowell, MA 01851

By: /s/ John Ullian
John Ullian, BBO#542786
Amy Puliafico, BBO#682332
The Law Firm of Ullian & Associates, P.C.
220 Forbes Road, Suite 106
Braintree, MA 02184
(781) 848-5980

Dated: April 14, 2025

CERTIFICATE OF SERVICE

I, John Ullian, hereby certify under the pains and penalties of perjury that I served the foregoing **ASSENTED TO MOTION TO CONTINUE THE FEBRUARY 26, 2025 HEARING REGARDING THE CHAPTER 13 TRUSTEE'S OBJECTION TO PLAN** either by ECF or by mailing a copy of same, postage prepaid, to the interested parties listed below.

Carolyn Bankowski
Chapter 13 Trustee Boston
P.O. Box 8250
Boston, MA 02114

Richard King, Office of the US Trustee
John W. McCormack Post Office & Court
House
5 Post Office Square, 10th Floor, Suite 1000
Boston, MA 02109

John Malone
28 Savin Hill Avenue
Dorchester, MA 02125

Bank of New York Mellon
Marcus Pratt, Esq.
Korde & Associates, P.C.
900 Chelmsford Street, Suite 3102
Lowell, MA 01851

Dated: April 14, 2025

/s/ John Ullian
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